



Oregon

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June 18, 2026

Biomass One, L.P.
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Sent electronically only

Kurt Lumpkin,

DEQ called in the Biomass One, L.P. (Biomass One) facility in White City, OR to the Cleaner Air Oregon (CAO) program on April 26, 2024. Biomass One submitted a CAO Emissions Inventory (Inventory) and combined CAO Modeling Protocol (Protocol) and Risk Assessment Work Plan (Work Plan) on December 20, 2024. DEQ reviewed the Inventory and issued a Comment Letter on July 25, 2025, requesting a revised Inventory and additional supporting information. Biomass One submitted supporting information on September 5, 2025, and the revised Inventory on October 6, 2025 (Your DEQ Online Submittal ID 71148). DEQ reviewed the revised Inventory and issued a second Comment Letter on December 19, 2025, requesting additional revisions. Biomass One submitted a revised Inventory and the requested information on April 1, 2026. A finalized Inventory was prepared by DEQ on behalf of Biomass One on April 24, 2026, incorporating changes approved by Biomass One via email correspondence on April 28, 2026. DEQ approved the Inventory on April 30, 2026. DEQ received the submittal of a revision to the combined Protocol and Work Plan on May 27, 2026.

DEQ has completed an initial review of the Protocol and Work Plan, and in accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), has determined that the following additional information, corrections, and updates are required to be submitted by **30 days** after the issuance date of this letter, or **July 18, 2026**:

1. The following TACs are listed in Section 3.2.1, but do have Risk-Based Concentrations (RBCs) in [OAR 340-245-8010 Table 2](#):
 - a. 1,4-Dioxane (CASRN 123-91-1);
 - b. 2,4,6-Trichlorophenol (CASRN 88-06-2);
 - c. Dichloromethane (CASRN 75-09-2);
 - d. Diethanolamine (CASRN 111-42-2);
 - e. Diethylene glycol monobutyl ether (CASRN 112-34-5);
 - f. Ethylene oxide (CASRN 75-21-8);
 - g. Trichloroethene (CASRN 79-01-6);
 - h. Vinyl chloride (CASRN 75-01-4);
 - i. Nickel and compounds (CASRN 7440-02-0). See Comment 6.a below;
 - j. Propylene glycol monomethyl ether (CASRN 107-98-2); and
 - k. Fluorides (CASRN 239).
2. In Section 3.1.2, Biomass One notes the following exposure location assignments on Mixed Farm-Forest (MFF) and Exclusive Farm-Use (EFU) zoned lands: residential for houses, worker for barnyards, and acute-only for fields or forests. Additionally, Biomass One indicated that receptors located in MFF or EFU zoned lands within 1.5 kilometers (km) of the facility will be

categorized as acute-only exposure locations except for any residences or working areas identified via satellite imagery. Per [OAR 340-245-0020\(43\)](#) and CAO guidance, any location where a house currently exists or could exist under zoning laws must be treated as a residential exposure location. To evaluate receptors on MFF and EFU zoned land as acute-only within 1.5 km of the facility, Biomass One must submit to DEQ both an AQ521 and an AQ522 form listing all receptors for which you are seeking an exposure location reclassification. [[OAR 340-245-0210\(1\)\(a\)\(F\)](#)] If DEQ approves the reclassification of these receptors, Biomass One will be required to submit annual verifying that land use at these receptors has not changed. [[OAR 340-245-0210\(1\)\(a\)\(F\)\(ii\)](#)] Alternatively, Biomass One can treat all receptors on EFU and MFF zoned land as residential exposure locations.

3. Update the lists of TACs with multipathway adjustment factors in Section 3.2.3 to include dioxins, which are noted as being emitted from the source.
4. Revise the statement about reference concentrations (RfCs) and unit risk factors (URFs) in Section 3.2.5 to indicate that Cancer URFs are developed to be protective, but unlike RfCs, they do not include uncertainty factors.
5. DEQ has reviewed the modeling emission rate calculations (Appendix C) in the “Appendix C. and E. Biomass One - CAO MP and RA WP.xlsx” workbook and identified the following errors which need to be addressed in the “Long Term Emission Rates per Emission Unit” table on the “ER – LT” Worksheet:
 - a. Incorrect emissions estimates for Methylene diphenyl diisocyanate (CASRN 101-68-8) from the Great Stuff Big Gap Filler material use at TEU-062.
6. DEQ has reviewed the Risk-Equivalent Emission Rate (REER) calculations (Appendix E) in the “Appendix C. and E. Biomass One - CAO MP and RA WP.xlsx” workbook and identified the following errors which need to be addressed:
 - a. Risk from emissions of Nickel and compounds (CASRN 7440-02-0) should be assessed using the RBCs for Nickel compounds, insoluble (DEQ ID 365). Update the REER calculations for the following TEUs/TESUs:
 - i. North Boiler, Biomass Fuel, Heat Input (TESU EU-011);
 - ii. North Boiler, NG Startup (TESU EU-011_Startup);
 - iii. South Boiler, Biomass Fuel, Heat Input (TESU EU-012);
 - iv. South Boiler, NG Startup (TESU EU-012_Startup); and
 - v. Space Heater (TEU EU-013).
 - b. The table of RBCs referenced in the REER calculations (“ODEQ RBCs” worksheet) is missing the following TACs, resulting in incomplete REER calculations for the Truck Shop Material Usage TEU (TEU-062):
 - i. 1,4-Dioxane (CASRN 123-91-1);
 - ii. Diethanolamine (CASRN 111-42-2);
 - iii. Diethylene glycol monobutyl ether (CASRN 112-34-5); and
 - iv. Ethylene oxide (CASRN 75-21-8).
 - c. The Acute Noncancer REER calculations (“ACUTE” worksheet) have errors in the reference to emission rates in the “ER - ST” worksheet for the following TACs:
 - i. Diethanolamine (CASRN 111-42-2);
 - ii. Ethylene oxide (CASRN 75-21-8);
 - iii. 1,4-Dioxane (CASRN 123-91-1);
 - iv. Diethylene glycol monobutyl ether (CASRN 112-34-5);
 - v. Ethylene glycol monopropyl ether (CASRN 2807-30-9);

- vi. Propylene glycol monomethyl ether acetate (CASRN 108-65-6);
- vii. 1,2,3-Trimethylbenzene (CASRN 526-73-8);
- viii. 1,2-Dichlorobenzene (CASRN 95-50-1);
- ix. Ethylene glycol monobutyl ether (CASRN 111-76-2);
- x. Ethylene glycol (CASRN 107-21-1); and
- xi. Nickel and compounds (CASRN 7440-02-0).

DEQ requests that you submit additional information to complete your Protocol and Work Plan. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines in this letter may result in a violation of [OAR 340-245-0030\(2\)](#).

If you have any questions regarding this letter please contact me directly at 971-300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,



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CAO Project Engineer

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